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March 18, 2016

## **VIA ECF FILING**

The Honorable John G. Koeltl United States District Judge Daniel Patrick Moynihan Courthouse 500 Pearl Street New York, NY 10007-1312

Re: ABS Entertainment, Inc. et al. v. CBS Corporation, et al. (Case No. 1:15-cv-

06801-JGK)

## Dear Judge Koeltl:

We present Defendants CBS Corporation and CBS Radio Inc. in the above referenced action. This letter is in response to the Court's order, dated March 18, 2016, Docket No. 91, directing the parties to appear for a pre-motion conference to be held on Wednesday, March 23, 2016 at 11:00am. Counsel from Irell & Manella LLP and Kelley Drye & Warren LLP respectfully request that Your Honor permit them to participate in the pre-motion conference telephonically.

Sincerely,

Irell & Manella LLP

Kelley Drye & Warren LLP

Robert M. Schwartz